

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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John Doe,

Plaintiff,

v.

State of New Jersey and Optimize Manpower Solutions,

Defendants.

Civil Action No. [Unassigned]

MOTION TO PROCEED UNDER A PSEUDONYM

Plaintiff, proceeding *pro se*, respectfully moves this Court for leave to proceed under the pseudonym “John Doe” pursuant to Federal Rule of Civil Procedure 10(a) and the Court’s inherent authority. In support, Plaintiff states:

I. INTRODUCTION

Although Rule 10(a) generally requires the names of all parties in a complaint, courts allow exceptions where the need for privacy outweighs the public interest in disclosure. This case presents such circumstances.

Plaintiff brings claims under Title IX and related federal law involving sensitive allegations. Public disclosure of Plaintiff’s identity risks personal, professional, and reputational harm.

II. BASIS FOR RELIEF

Plaintiff seeks anonymity to avoid stigmatization and potential retaliation. Specifically:

- The case involves sensitive personal matters, including discrimination and retaliation.
- Disclosure may result in embarrassment, reputational damage, and job-related harm.
- The suit challenges governmental activity.
- Plaintiff may be required to disclose intimate personal information.

- Defendants will not be prejudiced and may receive Plaintiff's identity under protective order.

Courts consider factors such as whether the plaintiff challenges government conduct, the risk of harm from disclosure, the sensitivity of the issues, and whether pseudonymity serves the public interest. See *Sealed Plaintiff v. Sealed Defendant #1*, 537 F.3d 185, 190 (2d Cir. 2008); *Doe v. Megless*, 654 F.3d 404, 408 (3d Cir. 2011). These factors favor anonymity in this case.

III. CONCLUSION

Plaintiff respectfully requests that the Court:

1. Grant leave to proceed under the pseudonym "John Doe"; and
2. Permit use of the pseudonym in all filings and proceedings, with Plaintiff's identity disclosed to Defendants and the Court under seal if necessary.

A proposed order is attached.

Respectfully submitted,

John Doe

Address: Withheld for Privacy

Phone/Email: Filed Under Seal

Dated: June 25, 2025